	Case 3:19-cr-04768-GPC Document 367	Filed 11/29/22 PageID.3784 Page 1 of 3							
1 2 3	Jeremy Warren WARREN & BURSTEIN State Bar No. 177900 501 West Broadway, Suite 240 San Diego, CA 92101								
4 5	(619) 234-4433 jw@wabulaw.com								
6	UNITED STATES DISTRICT COURT								
7	SOUTHERN DISTRICT OF CALIFORNIA								
8									
9	UNITED STATES OF AMERICA,) Case No.: 19cr4768-GPC)							
10 11	Plaintiff,	Unopposed motion to continue post-							
11	v.) trial motions hearing and sentencing							
13	GIOVANNI TILOTTA,))							
14	Defendant.)							
15) _)							
16	Mr. Tilotta moves, unopposed, to continue the post-trial motions hearing and								
17									
18	sentencing hearing currently set for December 5, 2022. Assuming the Court accepts								
19	Mr. Tilotta's motion, the parties agree with the following dates and deadlines (as								
20	provided by the Courtroom Deputy):								
21 22									
22	• Mr. Tilotta's moving papers to be filed by January 6, 2023								
24	Government's responses due by January 20, 2023								
25	• Motion hearing on January 27, 2023 at 2:30 p.m.								
26	• Sentencing hearing on February 17, 2023 at 9:00 a.m.								
27	Mr. Tilotta is on bond and his acknowledgment is attached. The additional								
28		attached. The autilitia							

Case 3:19-cr-04768-GPC Document 367 Filed 11/29/22 PageID.3785 Page 2 of 3

 time will allow for the parties to review trial transcripts and draft post-trial motions,

 as well as file any objections to the presentence report and for Mr. Tilotta to gather

 documents in support of sentencing mitigation.

 So moved.

Dated: November 29, 2022

<u>/s Jeremy Warren</u> Jeremy Warren Attorney for Mr. Tilotta

/s Andrew Haden

Andrew Haden

Dated: November 29, 2022

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

19

20

21

22

23

24

25

26

27

28

Dated: November 29, 2022

<u>/s Nicholas Pilchak</u> Nicholas Pilchak Assistant United States Attorney

Assistant United States Attorney

Signature authorization

I certify the above attorneys are aware of the content of this motion and has

18 authorized me to sign on their behalf.

Dated: November 29, 2022

<u>/s Jeremy Warren</u> Jeremy Warren

	Case 3:19-cr-04768-GPC	Document 367	File	ed 11/29/22	PageID.3786	Page 3 of 3		
1 2 3 4 5	Jeremy Warren WARREN & BURSTEIN State Bar No. 177900 501 West Broadway, Su San Diego, CA 92101 (619) 234-4433 jw@wabulaw.com	ite 240						
6	UNITED STATES DISTRICT COURT							
7	SOUTHERN DISTRICT OF CALIFORNIA							
8 9	UNITED STATES OF AMERICA,) Case No.: 19cr4768-GPC							
10		MOA,)	Case no	19014700-01			
11	Plaintiff,)	Acknowle	dgment of nex	xt court date		
12	v.)		-			
13	GIOVANNI TILOTTA,)					
14 15	Defendant.))					
16 17 18	I acknowledge my	post-trial mot	ion	s hearing h	as been conti	inued to January		
19	I acknowledge my post-trial motions hearing has been continued to January 27, 2023, at 2:30 p.m., and my sentencing hearing has been continued to February 17, 2023, at 9:00 a.m. I will be in court as directed on those dates and times.							
20 21								
22 23 24	29 Nov 2022 Dated:			Giova	anni Tilotta			
25								
26								
27								
28								
			1					